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26 Acacia Communications, Inc.

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

ViaSat, Inc.,
a Delaware corporation,

Plaintiff
and Counter Defendant,

v.

Acacia Communications, Inc.,
a Delaware corporation,

Defendant
and Counter Claimant,

) Case No.: 3:16-cv-00463-BEN-JMA
)
) Joint Motion for Approval of
) Stipulated Addendum to the
) Protective Order
)
) Dist. Judge: Hon. Roger T. Benitez
) Hon. Magistrate Jan M. Adler
)
) Case Initiated: January 21, 2016
)

1 In response to discovery requests from Plaintiff and Counterclaim Defendant
2 ViaSat, Inc., (“ViaSat”), certain third parties intend to produce certain documents,
3 including documents containing sensitive and proprietary information. These third
4 parties have accordingly requested certain additional protections for the information
5 that they may produce in response to any discovery in this case. ViaSat and
6 Defendant and Counterclaimant Acacia Communications, Inc. (“Acacia”) jointly
7 move the Court to grant the parties’ Joint Motion for Approval of a Stipulated
8 Addendum to the Protective Order in this case (Docket No. 29), as amended
9 (Docket No. 47), and enter the Stipulated Addendum attached hereto as Exhibit A.

10 Good cause exists for approving the Stipulated Addendum to the Protected
11 Order to allow the exchange of information through discovery while protecting the
12 confidential and highly sensitive nature of the information.

13

14 Date: July 14, 2017

FITZGERALD KNAIER LLP

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By: s/ Keith M. Cochran

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Kenneth M. Fitzgerald, Esq.

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Keith M. Cochran, Esq.

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Attorneys for Plaintiff and Counter
Defendant ViaSat, Inc.

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Date: July 14, 2017

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Counter Claimant Acacia

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1 **SIGNATURE CERTIFICATION**

2 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative
3 Policies and Procedures Manual, I hereby certify that the content of this document is
4 acceptable to Hunter D. Keeton, Esq., and I have obtained his authorization to affix
5 his electronic signature to this document.

6

7 Date: July 14, 2017

FITZGERALD KNAIER LLP

8 By: s/ Keith M. Cochran

9 Kenneth M. Fitzgerald, Esq.
10 Keith M. Cochran, Esq.
11 Attorneys for Plaintiff and
12 Counter Defendant ViaSat, Inc.

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